

1 JAMES P. KEMP, ESQ.
2 Nevada Bar No.: 6375
3 VICTORIA L. NEAL, ESQ.
4 Nevada Bar No.: 13382
5 KEMP & KEMP
6 7435 W. Azure Drive, Suite 110
7 Las Vegas, NV 89130
8 702-258-1183 ph /702-258-6983 fax
9 jp@kemp-attorneys.com
10 vneal@kemp-attorneys.com

11 Attorneys for Plaintiff
12 *Shamika Locklin*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 ***

16 SHAMIKA LOCKLIN,

17 Case No.: 2:21-cv-0230-JAD-BNW

18 Plaintiff,

19 vs.

20 MANDALAY BAY, LLC, a domestic limited
21 liability company, d/b/a MANDALAY BAY
22 RESORT AND CASINO; DOES I-X; and
23 ROE.

24 Defendants.

25 **STIPULATION AND ORDER TO
26 EXTEND TIME FOR PLAINTIFF TO
27 RESPOND TO DEFENDANT'S
28 MOTION TO DISMISS AT ECF NO. 26**

[First Request]

ECF No. 27

29 IT IS HEREBY STIPULATED by and between the parties, through their respective
30 counsel, that Plaintiff shall have, subject to the Court's approval, a two-week extension, up to and
31 including May 7, 2021, to respond to Defendant's Motion to Dismiss filed April 9, 2021 at ECF No.
32 26. This is the first stipulation for an extension of time to extend Plaintiff's deadline to respond. This
33 stipulation is made in good faith and not for purposes of improper delay.

1 This request is made because Plaintiff's counsel is experiencing a heavy case load including
2 in the week Defendant's Motion was filed, and in the weeks immediately following, a reply to a
3 Motion to Remove Confidential Designations, preparing two Early Neutral Evaluation Statements,
4 client preparation and attendance at those ENE's, preparing two settlement briefs, client preparation
5 and attendance of those settlement conferences, preparing discovery responses and initial
6 disclosures, two hearings, two preconference meetings with the court, a JAMS mediation, two all-
7 day depositions, and a 9th Circuit mediation.

8 For the above reasons so that Plaintiff can fully address the issues in Defendant's Motion to
9 Dismiss, the parties believe a two-week extension, up to and including May 7, 2021, is appropriate.
10

11 DATED this 19th day of April 2021.

12 KEMP & KEMP

13 _____
14 /s/ Victoria L. Neal
15 Victoria L. Neal, Esq.
16 Nevada Bar No.: 13382
17 7435 W. Azure Drive, Ste. 110
18 Las Vegas, NV 89130

19 Attorney for Plaintiff
20 Shamika Locklin

21 DATED this 19th day of April 2021.

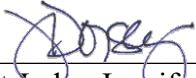
22 MGM RESORTS INTERNATIONAL

23 _____
24 /s/ Kelly Kichline
25 Kelly Kichline, Esq.
26 Nevada Bar No.: 10642
27 6385 S. Rainbow Blvd., Suite 500
28 Las Vegas, NV 89118

29 Attorney for Defendant
30 Mandalay Bay, LLC

31 **ORDER**

32 IT IS SO ORDERED:

33 
34 _____
35 U.S. District Judge Jennifer A. Dorsey
36 Dated: May 4, 2021